

The Honorable James L. Robart  
United States District Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.A., Antonio MACHIC YAC, and W.H.,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES; UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY; James MCCAMENT, Acting  
Director, U.S. Citizenship and Immigration  
Services; Elaine DUKE, Acting Secretary,  
U.S. Department of Homeland Security,

Defendants.

Case No. 2:15-cv-00813-JLR

STIPULATION AND ~~PROPOSED~~ ORDER  
REQUESTING EXTENSION OF TIME TO  
FILE COMBINED JOINT STATUS REPORT  
AND DISCOVERY PLAN and EXCHANGE  
INITIAL DISCLOSURES

NOTE ON MOTION CALENDAR:  
August 29, 2017

Pursuant to this Court's Order of August 3, 2017, ECF No. 98, the parties must exchange initial disclosures by August 31, 2017, and file a Combined Joint Status Report and Discovery Plan by September 7, 2017. As ordered, the parties held a Rule 26(f) conference on August 11, 2017. However, due to ongoing settlement discussions, other negotiations between the parties regarding discovery, and previously scheduled leave and travel obligations, the parties request an approximately three-week extension to exchange their initial disclosures and file the Combined Joint Status Report and Discovery Plan.

Accordingly, the parties to the above-referenced action, by and through their undersigned counsel of record, hereby respectfully STIPULATE, AGREE, and JOINTLY REQUEST that the

Stipulation and ~~Proposed~~ Order  
Case No. 2:15-cv-00813-JLR

U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
(202) 598-2446

1 Court extend the deadlines for initial disclosures and the Combined Joint Status Report and  
2 Discovery Plan by approximately three weeks. The parties request that initial disclosures be due  
3 on or before September 20, 2017, and that the Combined Joint Status Report and Discovery Plan  
4 be due on or before September 28, 2017.

5  
6 DATED: August 29, 2017

Respectfully submitted,

7 CHAD A. READLER  
8 Acting Assistant Attorney General

s/ Melissa Crow  
MELISSA CROW  
American Immigration Council  
1331 G Street, N.W., Suite 200  
Washington, D.C. 20005  
Phone: (202) 507-7523  
Email: mcrow@immcouncil.org

9 WILLIAM C. PEACHEY  
10 Director

11 JEFFREY S. ROBINS  
12 Assistant Director

DEVIN THERIOT-ORR  
Sunbird Law, PLLC  
1001 4th Avenue, Suite 3200  
Seattle, WA 98154  
Phone: (206) 962-5052

13 s/Adrienne Zack  
ADRIENNE ZACK  
14 Trial Attorney  
15 U.S. Department of Justice  
Civil Division  
16 Office of Immigration Litigation  
District Court Section  
17 P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
18 Phone: (202) 598-2443  
19 Fax: (202) 305-7000  
Email: adrienne.m.zack@usdoj.gov

CHRISTOPHER STRAWN  
Northwest Immigrant Rights Project  
615 2nd Avenue, Suite 400  
Seattle, WA 98104  
Phone: (206) 957-8628  
Fax: (206) 587-4025  
Email: chris@nwirp.org

20 Attorneys for Defendants

MARC VAN DER HOUT  
Van Der Hout, Brigagliano, and Nightingale,  
LLP  
180 Sutter Street, Suite 500  
San Francisco, CA 94104  
Phone: (415) 981-3000  
Email: ndca@vblaw.com

25 Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 29, 2017, I electronically filed the foregoing Stipulation Requesting Extension of Time to File Combined Joint Status Report and Discovery Plan and Exchange Initial Disclosures with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ Adrienne Zack  
ADRIENNE ZACK  
Trial Attorney  
U.S. Department of Justice

The Honorable James L. Robart  
United States District Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.A., *et al.*,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES, *et al.*,

Defendants.

Case No. 2:15-cv-00813-JLR

~~PROPOSED~~ ORDER EXTENDING TIME  
TO FILE COMBINED JOINT STATUS  
REPORT AND DISCOVERY PLAN and  
EXCHANGE INITIAL DISCLOSURES

NOTE ON MOTION CALENDAR:  
August 29, 2017

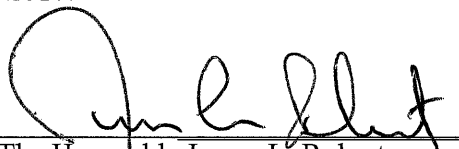
~~[Proposed] ORDER~~

The parties having so stipulated and agreed, it is hereby SO ORDERED.

The parties shall exchange initial disclosures on or before September 20, 2017, and the  
Combined Joint Status Report and Discovery Plan shall be due on or before September 28, 2017.

The Clerk is directed to send copies of this Order to all counsel of record.

Dated this 30 day of August, 2017.

  
The Honorable James L. Robart  
United States District Judge

Presented by:

CHAD A. READLER

Acting Assistant Attorney General

WILLIAM C. PEACHEY

Director

JEFFREY S. ROBINS

Assistant Director

s/ Adrienne Zack

ADRIENNE ZACK

Trial Attorney

U.S. Department of Justice

Civil Division

Office of Immigration Litigation

District Court Section

P.O. Box 868, Ben Franklin Station

Washington, D.C. 20044

Phone: (202) 598-2446

Fax: (202) 305-7000

Email: [adrienne.m.zack@usdoj.gov](mailto:adrienne.m.zack@usdoj.gov)

Attorneys for Defendants